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## Attorneys for the United States

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

UNITED STATES OF AMERICA, ) NO. CR 14-00236 JST  
Plaintiff, )  
v. ) STIPULATION AND [PROPOSED] ORDER  
ROBERT AKOLO, ) CONTINUING MOTION HEARING DATE AND  
Defendant. ) SETTING DEADLINE FOR DEFENDANT'S  
 ) REPLY BRIEF AND EXCLUDING TIME FROM  
 ) THE SPEEDY TRIAL ACT CALCULATION

A hearing on the defendant's motion to dismiss for outrageous government conduct is currently scheduled for June 1, 2015, at 2:00 p.m. The parties hereby stipulate to continue the hearing on the defendant's motion to dismiss to July 17, 2015, at 1:30 p.m. This continuance is requested because the defendant is currently in the District of Hawaii where he was sentenced to 139 months in prison on May 4, 2015. The defendant is in custody and he will be transported back to this district by the United States Marshal.

The parties request that the Court order that time be excluded pursuant to 18 U.S.C. section 3161(h)(1)(D) and (F).

1 Therefore, the parties agree, and the Court finds and holds, as follows:

2       1. The hearing on the defendant's motion to dismiss for outrageous government conduct is  
3 continued to July 17, 2015, at 1:30 p.m. The defendant's reply brief shall be due not later than July 2,  
4 2015.

5       2. The defendant agrees to an exclusion of time under the Speedy Trial Act from June 1, 2015,  
6 through July 17, 2015, since the defendant is currently in the District of Hawaii. The defendant agrees  
7 to this exclusion on the condition that his right to bring motions claiming Speedy Trial Act violations  
8 prior to June 1, 2015, shall remain preserved.

9       3. Counsel for the defendant believes that the exclusion of time is in her client's best interest.

10      4. Given these circumstances, the Court finds that the ends of justice served by excluding  
11 the period from June 1, 2015, through July 17, 2015, outweigh the best interest of the public and the  
12 defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A).

13      5. Accordingly, the Court orders that the period from June 1, 2015, through July 17, 2015, shall  
14 be excluded from Speedy Trial Act calculations under 18 U.S.C. §§ 3161(h)(1)(D), (F), and (h)(7)(A),

16 IT IS SO STIPULATED:

18 DATED: May 21, 2015

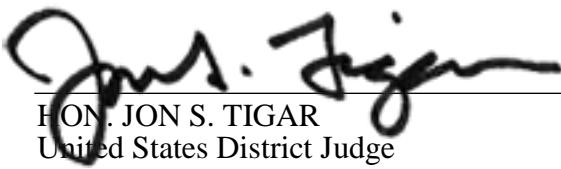
\_\_\_\_\_  
/s/  
CLAIRES LEARY  
Attorney for Defendant Akolo

21 DATED: May 21, 2015

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/s/  
AARON D. WEGNER  
Assistant United States Attorney

23 IT IS SO ORDERED.

25 DATED: May 21, 2015

  
\_\_\_\_\_  
HON. JON S. TIGAR  
United States District Judge